

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

BARBARA BROWN-RODGERS,

Plaintiff,

v.

DAVID BING, BLACK RACE, CHECK &  
GO, COMMUNITY MENTAL HEALTH  
MICHIGAN, COPYRIGHT OFFICE,  
CORPORATE COUNCIL, DEPARTMENT  
OF HUMAN SERVICES, CYPRESS DOE,  
MIKE DOE, DAISEY EDWARDS,  
PRENTIS EDWARDS, MERRY FOREST,  
CATHY GARRETT, AUDREY GILBERT,  
GUARDIAN ALARM, SUSAN HUBBARD,  
DOUGLAS JONES, KATHLEEN MCDONALD,  
COFFEY KINGSWORD, CATHY MAHER,  
MASSEYS, MEDICARE, MEDICARE  
FEDERAL, BENNIE NAPOLEON,  
LIONEL NIOUS, BARACK OBAMA,  
DOE OLLISON, OPM, DONALD PAGE,  
RICHARD PAGE, PARKWAYS DEALERSHIP,  
POST MASTER, PROTECTIVE SERVICES,  
PROTETCTIVE SERVICE, RADIO STATION  
107.5, DOE REED, JUDY STEMPIEN,  
WATER BOARD, ALBERTA WHITFIELD,  
DOE WILLIAMS, DOE WILLIAMS, AND  
ROBERT ZILKOWSKI,

Defendants.

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USDC, E.D. MICH. S.D.  
NO. 2:12-cv-12962  
Judge: Lawrence P. Zatkoff  
Magistr. Judge: Mark A. Randon

**MOTION TO DISMISS THE AMENDED COMPLAINT**

Defendants, President Barack Obama, United States Postmaster General, United States  
Department of Health and Human Services, Centers for Medicare and Medicaid Services, the United  
States Copyright Office, the Office of Personnel Management, and Lionel Nious, by and through

their attorneys, Barbara L. McQuade, United States Attorney for the Eastern District of Michigan, and Jan M. Geht, Trial Attorney, move this Court, pursuant to Fed.R.Civ.P. 12(b)(1) & 12(b)(6), for entry of an order dismissing the Amended Complaint.

After removing this proceeding from state court, the federal defendants moved to dismiss the complaint. (Docket No. 3). After their filing, Plaintiff filed an Amended Complaint on July 17, 2012. (Docket No. 6.) The federal defendants reviewed the Amended Complaint and it appears that Plaintiff has not raised any new allegations. (*Id.*) In fact, it appears that she simply included additional proofs of service as part of her filing.

Since the allegations in the Amended Complaint are the same as the ones in the Complaint, the federal defendants incorporate by reference their motion to dismiss (and the supporting documents), filed as Docket No. 3, and respectfully request that the Court dismiss the Amended Complaint.

Respectfully submitted,

BARBARA L. McQUADE  
United States Attorney

s/ Jan M. Geht  
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Dated: July 30, 2012

**CERTIFICATE OF SERVICE**

I hereby certify that on July 30, 2012, I electronically filed the foregoing paper, with all the accompanying documents, with the Clerk of the Court using the ECF system to all counsel of record and mailed by United States Postal Service the foregoing paper to the following non-ECF participants:

Barbara Brown-Rodgers  
Plaintiff Pro Se  
5324 McClellan  
Detroit, MI 48213

s/ Jan M. Geht  
JAN M. GEHT